

Privacy policy

1. Who we are?

Asapty Limited OY ("**Asapty**", "**Controller**") is a technology-driven company offering our marketing service of creating advertising campaigns for customers. You may find our contacts below (Clause 17).

If you have a question concerning the processing of your Personal data, you may contact to us any time at info@asapty.com.

The purpose of this privacy policy ("**Privacy Policy**") is to inform you of the steps we take regarding the collection, processing and use of the Personal data you provide to us when using the website <https://asapty.com/>.

We have tried to do our best to make this Privacy Policy easy for you to understand and to enable you to navigate easily through its contents.

2. General provisions & Service

This Privacy Policy is applicable to the processing of Personal data of the data subjects located in the European Union ("EU") and the European Economic Area ("EEA") by Asapty in respect of the following: website <https://asapty.com/>, Asapty SDK, ASO Builder, constant improvement and all other future services to be delivered by Asapty to its Customers inside the EU and the EEA ("**Services**").

From time to time, we may develop new or offer additional services. They'll also be subject to this Privacy Policy unless stated otherwise when we introduce them.

This Privacy Policy is *not* the Terms of service available at <https://asapty.com/about/terms-of-use>, which is a separate document. The Terms of service outline the legal contract between you and Asapty for using the Services.

This Privacy Policy is also applicable to the processing of Personal data of USA residents. We have included further information about rights and disclosures as required under the California Consumer Privacy Act ("**CCPA**") in our California Privacy Disclosures supplement available at <https://asapty.com/about/ccpa-policy>. **3. Definitions and interpretation**

The following definitions apply to this Privacy Policy:

Data subject, Customer, "you" or "your" means:

- visitors to our website;
- subscribers to any of the Services we offer through our website;
- potential or existing customers communicating with us by email or other means;

Representatives mean, in relation to a party, its employees, officers, contractors, subcontractors, representatives and advisers;

Controller means the natural or legal person, public authority, agency, or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal data; where the purposes and means of such processing are determined by EU or Member State law, the controller or the specific criteria for its nomination may be provided for by EU or Member State law;

Processor means a natural or legal person, public authority, agency, or other body which processes Personal data on behalf of the controller;

Personal data means any information relating to an identified or identifiable person (data subject) from which that person can be directly or indirectly identified such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological etc. It does not include data where the identity has been removed (anonymous data);

Member States mean all European Union member states, plus Iceland, Lichtenstein, Norway, and Switzerland — which are part of the European Economic Area;

The above definition and other terms under this Privacy Policy includes, where applicable, the definitions included in the General Data Protection Regulation (EU 2016/679) ("**GDPR**").

The following rules of interpretation will apply unless otherwise stipulated by these Terms:

- unless the context otherwise requires, words in the singular shall include the plural and, in the plural, shall include the singular;
- unless the context otherwise requires, a reference to one gender shall include a reference to the other gender.

4. Principles for the processing of Personal data

When processing Personal data, we comply with the following principles:

- Personal data are processed lawfully, fairly, and transparently in relation to the Data subject ("lawfulness, fairness and transparency");
- Personal data are collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes, or for statistical purposes shall not be considered incompatible with the original purposes ("purpose limitation");
- Personal data are adequate, relevant, and limited to what is necessary for relation to the purposes for which they are processed ("data minimisation");
- For our part, we make sure that Personal data is accurate and, where necessary, they are kept up to date; we take all reasonable steps to ensure that any Personal data that are inaccurate, having regard to the purposes for which they are processed, erased or rectified without delay ("accuracy");
- Personal data are kept in a form that permits identification of Data subjects for no longer than is necessary for the purposes for which the Personal data are processed; Personal data may be stored for longer periods insofar as the Personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, taking into account the implementation of appropriate technical and organisational measures required by the GDPR to safeguard the rights and freedoms of the Data subject ("storage limitation");
- Personal data are processed in a manner that ensures appropriate security of Personal data, including protection against unauthorised, or unlawful processing and accidental loss, destruction or damage, using appropriate technical or organisational measures ("integrity and confidentiality").

We shall take all necessary measures to demonstrate that we comply with the above principle.

5. What data, for what purposes, how long, and based on what grounds do we process as a Controller?

Purpose of Processing	Data Subjects: Categories of data	Storage Period	Legal Basis
to offer access to a FREE version of the Services	our website visitors, our potential customers or its Representatives: email address	5 years	processing is necessary in order to take steps at your request prior to entering into a contract with us
to fulfill our obligations to you under the contract with our Customers	Customers and/or Customers' Representatives: email address, registration date, logs of your actions on our website	until the termination of a contract	processing is necessary for the performance of a contract to which you are the party
to send direct email marketing communications about our Services	subscribers to our newsletter: email address	until you withdraw your consent or until the end of the campaign whichever happened earlier	your consent to receive our newsletter. You may withdraw your consent at any time by clicking the "unsubscribe" link in the email communications we send to you
to better understand your preferences, to help you navigate	Our customers, their Representatives, or other website visitors: type	5 years or until you withdraw your consent	your consent to store cookies in your browser. You may withdraw your

our website, to personalize and provide a more convenient experience to you, to analyze which pages you visit, and to measure advertising and promotional effectiveness	of device and its display resolution, traffic source for the visitor, OS and browser language, which buttons are being clicked and what pages are being opened and cookies	whichever happened earlier	consent at any time by clicking the managing cookie button
to deliver targeted advertisements to individuals who visit our website	Our Customers, their Representatives, or other website visitors cookie files (for more details, see Cookie Policy)	5 years	-

6. What data do we process as a Processor of our Customers (Controllers)?

Aspty processes Personal data on behalf of its Customers inside the EEA and the EU in respect of the Services and therefore acts as a processor in the sense of the GDPR (“**Processor**”).

Aspty’ Customers determine the purposes and means of the processing of Personal data in respect of the Services inside the EEA the EU and therefore act as a controller in the sense of the GDPR (“**Controller**”).

The processing of Personal data by Aspty on behalf of its Customers is only allowed in respect of providing Services inside the EEA the EU. Aspty is not allowed to process Personal data for its own purposes and means. Should Aspty nevertheless process Personal data for its own purposes and means in respect of the Services inside the EEA, then in such case only, Aspty acts as a Controller in the sense of the GDPR.

We usually process the following Personal data on behalf of our Customers in respect of the Services: email address, traffic source for the visitor, device data from which the website is viewed and cookies.

7. Who do we share your data with?

Acting as a Controller we share your data with the following processors:

Purpose of processing	Processors, their location and the link to the privacy policy / website if applicable	Safeguards for restricted transfers (outside the EEA and ‘adequate’ jurisdictions)
to offer access to a FREE version of the Service	Google LLC (Google Cloud Platform) (the USA), Privacy Policy	We transfer your data according to the Model Contract Clauses between us and Google
to fulfill our obligations to you under the contract with our Customers	Google LLC (Google Cloud Platform) (the USA), Privacy Policy	We transfer your data according to the Model Contract Clauses between us and Google
	MongoDB (Ireland), Privacy Policy .	We transfer your data according to the Data Processing Agreement between us and MongoDB
to send direct email marketing communications about our Service	None	Not applicable

to better understand your preferences, to help you navigate our website, to personalize and provide a more convenient experience to you, to analyze which pages you visit, and to measure advertising and promotional effectiveness, cloud hosting	Google LLC (Google Analytics) (the USA), Privacy Policy	We transfer your data according to the Model Contract Clauses between us and Google
	Cybot A/S (Cookiebot) (Denmark), Privacy Policy	We transfer your data (cookies) according to the Terms of Service between us and Cybot A/S
to deliver targeted advertisements to individuals who visit our website	Facebook Inc.(Facebook Custom Audiences) (the USA), Privacy Policy	
	Google LLC (Google Ads) (the USA), Privacy Policy	We transfer your data according to the Google Ads Data Processing Terms between us and Google
	LinkedIn Corp. (the USA), Privacy Policy	

8. Remarketing

Aspty uses remarketing services to advertise to you after you accessed or visited our website ad described in Clause 7. Aspty and remarketing services use cookies and non-cookie technologies to help Aspty recognize your device and understand how you use our Service so that we can improve our Service to reflect your interests and serve you advertisements that are likely to be of more interest to you.

The remarketing services we use are:

- Google Ads;
- Facebook;
- LinkedIn.

You can opt-out of Google Analytics for Display Advertising and customise the Google Display Network ads by visiting the Google Ads Settings page: <http://www.google.com/settings/ads>. Google also recommends installing the Google Analytics Opt-out Browser Add-on - <https://tools.google.com/dlpage/gaoptout> - for your web browser.

To opt-out of Facebook's interest-based ads, follow these instructions from Facebook: <https://www.facebook.com/help/568137493302217>. Facebook adheres to the Self-Regulatory Principles for Online Behavioural Advertising established by the Digital Advertising Alliance. You can also opt-out from Facebook and other participating companies through the Digital Advertising Alliance in the USA <http://www.aboutads.info/choices/>, or opt-out using your mobile device settings.

9. Security of Personal data

We are ensuring the confidentiality of the processed Personal data on behalf of our Customers, under the procedure provided by applicable legislation. Protection of Personal data is supported by the implementation of legal,

organisational, and technical measures necessary and sufficient to ensure that the requirements of the applicable data protection legislation are met.

10. Automated decisions

We do not make any automated decisions about you that would result in legal or other similarly significant effects on you.

11. Request for additional information to identify the Data subject

During the processing of your data, we may ask you to provide us with additional information to enable us to identify you.

On our part, we endeavour to obtain a minimum of additional information in order to be able to carry out such identification. If you do not provide us with said additional information upon our request, we will not be able to exercise your rights.

If you believe that we are violating your rights in the processing of your confidential Personal data, you may lodge a complaint with the relevant supervisory authority.

12. Your rights as a Customer

You have the following rights under the GDPR with respect to Personal data:

- the right to access;
- the right to rectification of the processed data;
- the right of erasure ('the right to be forgotten');
- the right to restriction of processing;
- the right to data portability;
- the right to object and automated individual decision-making; the right to withdraw consent;
- The right to lodge a complaint.

To exercise these rights, please contact us by email at info@aspty.com.

12.1. Right of access to information held about you

The Data subject has the right to obtain from the Controller confirmation as to whether or not Personal data concerning him or her are being processed and, if so, access to the data, as well as other information, namely:

- information about the purposes for which the Personal data are processed;
- information on the categories of Personal data concerned;
- information on the recipients or categories of recipients to whom the Personal data have been or will be disclosed, including recipients in third countries (outside EU and EEA) or international organisations;
- information on the envisaged period for which the Personal data will be stored, or, if not possible, the criteria used to determine that period;
- information on the existence of the right of rectification or the right to erasure or the right to object of processing of Personal data concerning the data subject or to object to such processing;
- if the data are not collected from you, any available information on the source of the data;
- information on the right to lodge a complaint with a supervisory authority;
- information on the guarantees of data transfer to third countries (outside the EU and EEA) or to international organisations, where a such transfer will take place;
- information about the availability of automated decision-making, including profiling, and, where available, information about the logic involved, as well as the significance and the envisaged consequences of such processing for you.

12.2. The right to rectification of Personal data

We take all measures to detect any inaccurate, incomplete or outdated Personal data.

You have the right to rectify your Personal data without undue delay if it is inaccurate, incomplete, or out of date.

Once we have rectified your Personal data, we will promptly provide you with appropriate notification.

12.3. The right to the erasure of your Personal data

You have the right to request the erasure of your Personal data, and this will be done without undue delay.

If we cannot erase your Personal data, we will anonymise it in a way that you are not identified.

Once your Personal data has been erased or anonymised, you will be notified.

We cannot exercise the right to the erasure of your Personal data in particular if your Personal data is processed:

- in order to exercise the right to freedom of expression and information;
- in order to comply with a legal obligation that requires the processing of data in accordance with the provisions of Union or Member State law to which the controller is subject, or for the performance of a task carried out in the public interest, or in the exercise of official authority vested in the controller;
- for reasons of public interest in the area of public health;
- for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes;
- for the establishment, exercise, or defence of legal claims.

12.4. Right to restrict processing

Where the processing is restricted, we will store your Personal data, but we will not process it further until the restrictions are removed. Restrictions on processing can be removed at any time upon request.

The right to restrict data processing can only be exercised in the following cases:

- the accuracy of the Personal data will be contested by you for a period of time that allows us to verify the accuracy of the Personal data;
- the processing of your Personal data is unlawful and you oppose the erasure of the Personal data and request the restriction of their use instead;
- where we no longer need the Personal data for the purposes of the processing, but they are required by you for the establishment, exercise, or defense of legal claims;
- you object to the processing pending verification of whether the legitimate grounds indicated by the controller override the grounds indicated by you.

Exceptions to this right. Once we have restricted the processing of your Personal data, we may continue processing in the following cases:

- with the data subject's consent, in order to establish, exercise or defend against legal claims;
- in order to protect the rights of another natural or legal person;
- for reasons of important public interest of the Union or a Member State.

12.5. Right to data portability

You have the right to receive the Personal data that you have provided to us in a structured, commonly used and machine-readable format and the right to transmit this data to another controller, as far as this is technically possible.

You can exercise the aforementioned right if the data are subject to processing on the basis of your consent or a contract signed with you and the data are processed electronically.

12.6. Right to object

You have the right, at any time, to object to the processing of Personal data based on your particular situation:

- in relation to the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- in relation to the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by interests or fundamental rights and freedoms of the data subject, which require protection of personal data, in particular where the data subject is a child.

We will no longer process your Personal data unless we identify compelling legitimate grounds for the processing.

You have the right at any time to object to the processing of your Personal data for direct marketing purposes.

12.7. Automated individual decision-making including profiling

You have the right not to be subject to decisions based solely on automated processing, including profiling, which produces legal effects on you or has a similar significant impact on you.

Exceptions to this right:

- it is necessary for the entering into or performance of a contract between the Data subject and the Controller;

- it arises from a provision of EU or Member State law to which the Controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests; it is based on the explicit consent given by the Data subject.

12.8. Right to withdraw consent

If you have consented to the processing of your Personal data, you have the right to withdraw such consent at any time.

We process your Personal data on the basis of consent for mailing, push notifications, and cookie processing.

We provide you with the possibility to withdraw your consent in a simple way, i.e:

- You can withdraw your consent to receive emails by clicking on the "unsubscribe" link that is available in every email communication;
- You have the option to manage your marketing preferences for push notifications using your browser or phone settings, or by contacting us;
- You can withdraw your consent to the processing of cookies through any of our websites using the cookie control tool.

12.9. Right to lodge a complaint with a supervisory authority

You have the right to lodge a complaint with the supervisory authority of your own country if you have concerns about the manner in, which we process your Personal data and about the protection and exercise of your rights.

You can find the contact details of your country's supervisory authority on the website of the European Data Protection Board here https://edpb.europa.eu/about-edpb/board/members_en.

13. Conditions under which we provide you with information related to your rights

Information related to your rights is provided free of charge. Where the data subject's requests are manifestly unfounded or excessive, in particular, because of their repetitive character, we may charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the requested action, or refusing to act on the request.

14. Payments

We will not store or collect your payment card details. We use the third-party service Stripe for payment processing (e.g. payment processors).

The payment card details are provided directly to our third-party payment processor Stripe whose use of your personal information is governed by [Stripe's privacy policy](#).

We may ask you to provide information to facilitate this transaction and verify your identity.

15. Cookies

Asapty also uses cookies. You can find more information about cookies [here](#).

16. Changes to this Privacy Policy

We may occasionally make changes to this Privacy Policy.

When we make material changes to this Privacy Policy, we'll provide you with prominent notice as appropriate under the circumstances. For example, we may display a prominent notice within the Service or send you an email or device notification.

17. How to contact us

For any questions or concerns about this Policy, contact us any one of these ways:

email info@asapty.com

write to us at: Westendintie 99A3, Espoo, Finland, 02160